

Designation Run Report

Quintero, Gilberto - Plaintiffs' Submission

Quintero, Gilberto 12-06-2018

Plaintiffs Affirmative Designations 00:04:05

Defense Completeness Counters 00:00:46

Total Time 00:04:51



GQ02-Quintero, Gilberto - Plaintiffs' Submission

Page/Line	Source	ID
12:06 - 12:16	Quintero, Gilberto 12-06-2018 (00:00:14) 12:6 Q. Would you state your full name for 12:7 the record, please. 12:8 A. My name is Gilberto Quintero. 12:9 Q. Mr. Quintero, where are you 12:10 currently employed? 12:11 A. I'm currently employed at Cardinal 12:12 Health. 12:13 Q. And you've been with Cardinal 12:14 Health since December of 2009; is that right? 12:15 A. December 1st, 2009, that's 12:16 correct.	GQ02.1
16:20 - 17:12	Quintero, Gilberto 12-06-2018 (00:00:45) 16:20 Q. And so then in December of 2009, 16:21 Cardinal brought you in and they brought you 16:22 straight into senior vice president of QRA, 16:23 which is quality regulatory -- remind me the A. 16:24 It's not affairs, it is -- 17:1 A. It's regulatory affairs. 17:2 Q. Okay. And so your duties in that 17:3 position were what? 17:4 A. Was supposed to make sure that the 17:5 departments that I managed comply with the 17:6 regulations and expectations from the 17:7 government, and that we execute according to our 17:8 quality procedures. 17:9 Q. And you were brought in to -- you 17:10 were brought in by Cardinal to make sure that 17:11 QRA was improving, correct? 17:12 A. Yes.	GQ02.2
17:19 - 17:20	Quintero, Gilberto 12-06-2018 (00:00:02) 17:19 Q. You were brought in, though, to 17:20 fix QRA, right?	GQ02.3
17:23 - 18:08	Quintero, Gilberto 12-06-2018 (00:00:25) 17:23 A. I don't believe I -- you know, my 17:24 understanding, I was brought in to make sure the 18:1 company had a robust quality and regulatory 18:2 compliance program. 18:3 Q. And when you got there, did it 18:4 have a robust quality and regulatory program?	GQ02.4

GQ02-Quintero, Gilberto - Plaintiffs' Submission

Page/Line	Source	ID
18:5	A. There were some things that I	
18:6	wanted to improve, like my philosophy over my	
18:7	career is to take what is -- what we have today	
18:8	and try to make it better.	
195:04 - 195:14	Quintero, Gilberto 12-06-2018 (00:00:25)	GQ02.5
195:4	Q. Mr. Quintero, we have talked a bit	
195:5	about what happened in terms of the DEA action	
195:6	against Cardinal in late 2011, early 2012 today.	
195:7	The first thing that happened,	
195:8	though, was that an administrative investigative	
195:9	warrant was served?	
195:10	A. (Nods head.)	
195:11	Q. Do you recall that being served?	
195:12	A. Yes, I do.	
195:13	Q. Did you see a copy of it?	
195:14	A. I saw a copy of that at that time.	
195:19 - 196:18	Quintero, Gilberto 12-06-2018 (00:01:27)	GQ02.6
195:19	Q. This will be Exhibit 10. It's	P-44562_1.1
195:20	3776. And the Bates is	
195:21	CAH_MDL_PRIORPROD_DEA12_00003808.	
195:22	So this is the warrant for	P-44562_1.1.1
195:23	inspection. Did you receive this at some point?	
195:24	A. Yes, we did. I got a copy of this	
196:1	at one point.	
196:2	Q. And one of the things that was	
196:3	requested is in Paragraph c -- 2c, do you see	P-44562_1.2.1
196:4	that, "To inspect all records, files, papers,	
196:5	processes, controls, facilities appropriate for	
196:6	verification of the records, reports and	
196:7	documents required to be kept under the	
196:8	provisions of the act and regulations	
196:9	promulgated thereunder."	
196:10	Do you see that?	
196:11	A. Correct.	
196:12	Q. Now, this is a warrant served on	
196:13	Cardinal with regard to Lakeland Distribution	
196:14	Center, correct?	
196:15	A. Correct.	
196:16	Q. And this is the DEA telling	
196:17	Cardinal that we want more information about	

GQ02-Quintero, Gilberto - Plaintiffs' Submission

Page/Line	Source	ID
196:20 - 197:11	<p>196:18 Lakeland Distribution Center, correct?</p> <p>Quintero, Gilberto 12-06-2018 (00:00:42)</p> <p>196:20 A. This is an inform -- I mean, a</p> <p>196:21 warrant for inspection, which some of the</p> <p>196:22 requirements have to inspect records and they</p> <p>196:23 ask for records.</p> <p>196:24 Q. And they're looking</p> <p>197:1 specifically -- at least one part of what</p> <p>197:2 they're looking for are the records that are</p> <p>197:3 required to be kept under the act, the</p> <p>197:4 Controlled Substances Act, correct?</p> <p>197:5 A. Correct.</p> <p>197:6 Q. And if Cardinal has an agreement</p> <p>197:7 with the DEA and an understanding in terms of</p> <p>197:8 what their obligations are to -- as to what to</p> <p>197:9 record and report, then Cardinal should have</p> <p>197:10 what the DEA's looking for under the provisions</p> <p>197:11 of the act. Wouldn't you agree?</p>	GQ02.7
197:15 - 197:17	<p>Quintero, Gilberto 12-06-2018 (00:00:06)</p> <p>197:15 A. We should have the records that</p> <p>197:16 are required. Per the regulations, we should</p> <p>197:17 have that.</p>	GQ02.8
197:18 - 197:20	<p>Quintero, Gilberto 12-06-2018 (00:00:12)</p> <p>197:18 Q. Okay. And was Cardinal or was</p> <p>197:19 Cardinal not keeping proper records of its due</p> <p>197:20 diligence during -- prior to October 26, 2011?</p>	GQ02.9
197:22 - 197:24	<p>Quintero, Gilberto 12-06-2018 (00:00:09)</p> <p>197:22 A. My understanding is Cardinal</p> <p>197:23 Health has always kept all the records required</p> <p>197:24 per the regulations.</p>	GQ02.10
198:06 - 198:09	<p>Quintero, Gilberto 12-06-2018 (00:00:09)</p> <p>198:6 Q. Was Cardinal, prior to</p> <p>198:7 October 26th, 2011, doing all of the due</p> <p>198:8 diligence required of it with regard to</p> <p>198:9 controlled substances?</p>	GQ02.11
198:11 - 198:14	<p>Quintero, Gilberto 12-06-2018 (00:00:12)</p> <p>198:11 A. We were executing according to the</p> <p>198:12 regulatory requirement stated in the act.</p> <p>198:13 Q. And you were keeping records of</p> <p>198:14 such due diligence actions, correct?</p>	GQ02.12

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198:16 - 198:17

Quintero, Gilberto 12-06-2018 (00:00:04)

GQ02.14

198:16 A. We were keeping records that are
198:17 required by the act to be kept.

Plaintiffs Affirmative Designations = 00:04:05

Defense Completeness Counters = 00:00:46

Total Time = 00:04:51**Documents Shown**

P-44562_1